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*Attorneys for Plaintiff Sears, Roebuck and Co. and
Kmart Corp*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: Cathode Ray Tube (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-md-05944-SC

This Document Relates To:

MDL No. 1917

Sears, Roebuck and Co., and Kmart Corporation v. Chunghwa Picture Tubes, Ltd., et al., Case No. 11-cv-5514-SC

**JAMES E. SMITH DECLARATION IN
SUPPORT OF DIRECT ACTION
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT BASED UPON
PLAINTIFFS' PURPORTED FAILURE
TO DISTINGUISH BETWEEN
ACTIONABLE AND NON-ACTIONABLE
DAMAGES UNDER THE FTAIA**

Sears, Roebuck and Co., and Kmart Corporation v. Technicolor SA, et al., Case No. 13-cv-5262-SC.

Judge: Hon. Samuel P. Conti
Court: Courtroom 1, 17th Floor
Date: February 6, 2015
Time: 10:00 a.m.

1 I, James E. Smith, hereby declare as follows:

2 1. I am currently employed at Sears Holdings Management Corporation. I make this
 3 declaration based on my personal knowledge.

4 2. I have previously held the position of Buyer for Consumer Electronics with Sears
 5 Holdings Management Corporation, and prior to that, I worked as a buyer of video products for
 6 Sears, Roebuck and Co. ("Sears"). Due to these positions, I have personal knowledge regarding
 7 the practices and procedures used by Sears and Kmart Corporation ("Kmart") to purchase CRT
 8 Products.

9 3. At all times between 1995 and 2007, Sears purchased CRT Products from its
 10 offices in Hoffman Estates, Illinois. Between 1995 and 2005, Kmart purchased CRT Products
 11 from its offices in Troy, Michigan. "All purchases of CRTs and CRT Products were negotiated
 12 and directed from Sears' and Kmart's headquarters in Hoffman Estates, Illinois, and Troy,
 13 Michigan, respectively, (ii) all purchase orders were issued from Plaintiffs' respective
 14 headquarters; (iii) all invoices were sent to Plaintiffs' respective headquarters or other office
 15 facilities." *See* Sears & Kmart's Objections and Responses to TAEC & PENAC's First Set of
 16 Interrogatories (Attached hereto as Exhibit 1). In March of 2005, after Sears and Kmart were
 17 involved in a business combination that led to the combined ownership of Sears and Kmart, the
 18 process of purchasing CRT Products was centralized at Sears' offices in Hoffman Estates,
 19 Illinois. *See id.*

20 4. A true and correct copy of excerpts from the Rule 30(b)(6) deposition Sears, dated
 21 July 11, 2014 [pp. 1-4; 72-74; 81-84], identifying the Defendants, co-conspirators and their
 22 affiliates in the United States from which Sears purchased CRT Products, and the location from
 23 which those purchases were made, is attached hereto as Exhibit 2.

24 5. During the Relevant Period, Sears and Kmart purchased CRT Products directly
 25 from Defendants, co-conspirators, their affiliates and divisions in the United States.

26 6. A true and correct snapshot of SEAR_CRT0000004-3B-Highly Confidential.xls
 27 and SEAR_CRT0000007-HIER-Highly confidential.xls reflecting Sears' purchase data during
 28 the Relevant Period, and a true and correct snapshot of KMRT_CRT00000012-2007-Highly

1 Confidential.xls, reflecting Kmart's purchase data during the Relevant Period, are attached
2 hereto as Composite Exhibit 3.

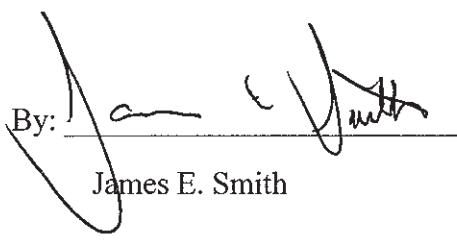
3 I declare under penalty of perjury that the foregoing is true and correct.
4 Executed this 17th day of December, 2014, at Hoffman Estates, Illinois.
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9 By: 
10 James E. Smith
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EXHIBIT 1

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Counsel for Plaintiffs Sears, Roebuck and Co. and Kmart Corporation

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT) ANTITRUST
LITIGATION

This Document Relates to: Individual Case No. &
11-cv-05514-SC

SEARS, ROEBUCK AND CO. & KMART
CORPORATION

v.

HITACHI, LTD., *et al.*,

Defendants.

Master Case No. 3:07-cv-05944-SC
Individual Case No. 3:11-cv-05514-SC

MDL No. 1917

**PLAINTIFFS SEARS, ROEBUCK AND CO. &
KMART CORPORATION'S OBJECTIONS AND
RESPONSES TO DEFENDANTS TOSHIBA
AMERICA ELECTRONIC COMPONENTS, INC.
AND PHILIPS ELECTRONICS NORTH
AMERICA CORPORATION'S FIRST SET OF
INTERROGATORIES**

RESPONDING PARTIES: Plaintiffs Sears, Roebuck and Co. and Kmart Corporation

PROPOUNDING PARTIES: Defendants Toshiba America Electronic Components,
Inc. and Philips Electronics North America Corporation

SET NO.: ONE

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and Rule 33.1 of
the Local Rules of the Northern District of California, Plaintiffs Sears, Roebuck and Co.,

individuals involved in thousands of discrete purchases made over the course of more than 12 years, dating back to 1995. Plaintiffs also object to Instruction "8" to the extent that it calls for information beyond Plaintiffs' possession, custody or control.

9. When referring to a purchase, "identify" means to identify each person involved in negotiating the purchase, the place(s) of purchase negotiation, the date and place of purchase, size, model, type (CPT or CDT), seller and manufacturer of each CRT purchased, each Person involved in the purchase and the time period and nature of each Person's involvement, and any Documents or other evidence of the purchase.

Objection: Plaintiffs objects to General Instruction "9" because it is overly broad, unduly burdensome, and oppressive, insofar as it requests that Plaintiffs identify thousands of discrete purchases made over the course of more than 12 years, dating back to 1995. Plaintiffs also object to Instruction "9" to the extent that it calls for information beyond Plaintiffs' possession, custody or control. Plaintiffs' responses below are based on a reasonable, good faith, non-exhaustive search and inquiry and mindful that fact and expert discovery are ongoing.

RESPONSES AND OBJECTIONS TO INTERROGATORIES

Interrogatory No. 1:

Describe in detail and in narrative form (including by identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for Your allegation in Paragraph 86 of Your Complaint that You have "participated in the market for CRTs."

Response to Interrogatory No. 1:

Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs further object to this Interrogatory on the grounds that: (i) it is a premature contention interrogatory; (ii) it is unreasonably overbroad, including without limitation General

Instructions 8 and 9, thus making the response unduly burdensome; (iii) it seeks information that is, or will be, the subject of expert opinions, reports, and/or testimony; (iv) depending on Defendants' intent, it may call for a legal conclusion; (v) it seeks information that is in Defendants' possession, custody, or control, and that has not yet been provided to Plaintiffs; and (vi) it seeks information that is the subject of ongoing discovery and investigation.

Subject to and without waiving their general and specific objections, Plaintiffs state that documents and transactional data produced in response to Defendants Tatung Company of America, Inc. and Samsung Electronics Co., Ltd's First Set of Requests for Production of Documents shall be deemed produced in response to this Interrogatory, subject to the Responses and Objections contained herein. The burden of identifying the specific information or documents responsive to this Interrogatory from review of the documents and data identified in this response is substantially the same for either Plaintiffs or the Defendants. *See Fed. R. Civ. P. 33(d).* Additionally, the response to this Interrogatory may include the transactional data and other documents produced by Defendants, co-conspirators', and third party's discovery, and such other information as set forth in the initial report(s) of Plaintiffs' experts served on April 15, 2014.

Plaintiffs reserve the right to supplement their response to this Interrogatory based on further discovery, investigation, expert work, or other developments in this case.

Interrogatory No. 2:

Describe in detail and in narrative form (including identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for Your allegation in Paragraph 85 of Your Complaint that "[t]he market for CRTs and the market for the products into which they are placed are inextricably linked and intertwined."

Interrogatory No. 3:

Describe in detail and in narrative form (including identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for Your allegation in Paragraph 209 of Your Complaint that You were "not able to pass on to [Your] customers the overcharges caused by Defendants' conspiracy."

Response to Interrogatory No. 3:

Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs further object to this Interrogatory on the grounds that: (i) it is a premature contention interrogatory; (ii) it is unreasonably overbroad, including without limitation General Instructions 8 and 9, thus making the response unduly burdensome; (iii) it seeks information that is, or will be, the subject of expert opinions, reports, and/or testimony; (iv) depending on Defendants' intent, it may call for a legal conclusion; (v) it seeks information that is in Defendants' possession, custody, or control, and that has not yet been provided to Plaintiffs; and (vi) it seeks information that is the subject of ongoing discovery and investigation.

Subject to and without waiving their general and specific objections, Plaintiffs state that documents and transactional data produced in response to Defendants Tatung Company of America, Inc. and Samsung Electronics Co., Ltd's First Set of Requests for Production of Documents shall be deemed produced in response to this Interrogatory, subject to the Responses and Objections contained herein. The burden of identifying the specific information or documents responsive to this Interrogatory from review of the documents and data identified in this response is substantially the same for either Plaintiffs or the Defendants. *See Fed. R. Civ. P. 33(d).* Additionally, the response to this Interrogatory may include the transactional data and other documents produced by Defendants, co-conspirators', and third party's discovery, and

such other information as set forth in the initial report(s) of Plaintiffs' experts served on April 15, 2014.

Plaintiffs reserve the right to supplement their response to this Interrogatory based on further discovery, investigation, expert work, or other developments in this case.

Interrogatory No. 4:

For every CRT Product upon which You assert a claim, describe in detail and in narrative form (including by identifying each Document, Person or other evidentiary source that You rely upon) each and every step of the distribution chain, and every intermediary in that distribution chain, from the time a CRT is manufactured until it is sold as a CRT Product to an individual end consumer in the retail market.

Response to Interrogatory No. 4:

Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs further object to this Interrogatory on the grounds that: (i) it is unreasonably overbroad, including without limitation General Instructions 8 and 9, thus making the response unduly burdensome and oppressive, particularly in that it seeks detailed information for each and every CRT or CRT Product Plaintiffs purchased over an approximate 12-year period; (ii) it seeks information that is, or will be, the subject of expert opinions, reports, and/or testimony; (iii) it seeks information that is in Defendants' possession, custody, or control, and that has not yet been provided to Plaintiffs; (iv) it seeks information that is not relevant to any claim or defense in these proceedings; and (v) it seeks information that is the subject of ongoing discovery and investigation.

Subject to and without waiving their general and specific objections, Plaintiffs state that Defendants, co-conspirators, and/or subsidiaries and affiliates of Defendants and co-conspirators manufactured CRTs and CRT Products in various manufacturing plants located

throughout the world. Some of the CRTs and CRT Products manufactured by the Defendants, co-conspirators, and/or subsidiaries and affiliates of Defendants and co-conspirators were destined for the United States. Plaintiffs purchased CRT Products from Defendants, co-conspirators, and /or subsidiaries and affiliates of Defendants and co-conspirators by issuing purchase orders to the Defendants, co-conspirators, and/or subsidiaries and affiliates of Defendants and co-conspirators, who then shipped the CRT Products to Plaintiffs' United States distribution centers or stores. CRT Products shipped to Plaintiffs' distribution centers were then shipped by Plaintiffs to their stores for ultimate purchase by the end-user consumer. Plaintiffs further state that documents and transactional data produced in response to Defendants Tatung Company of America, Inc. and Samsung Electronics Co., Ltd's First Set of Requests for Production of Documents shall be deemed produced in response to this Interrogatory, subject to the Responses and Objections contained herein. The burden of identifying the specific information or documents responsive to this Interrogatory from review of the documents and data identified in this response is substantially the same for either Plaintiffs or the Defendants. *See Fed. R. Civ. P. 33(d).* Additionally, the response to this Interrogatory may include the transactional data and other documents produced by Defendants, co-conspirators', and third party's discovery, and such other information as set forth in the initial report(s) of Plaintiffs' experts served on April 15, 2014.

Plaintiffs reserve the right to supplement their response to this Interrogatory based on further discovery, investigation, expert work, or other developments in this case.

Interrogatory No. 5:

Describe in detail and in narrative form (including by identifying each Document, Person or other evidentiary source that You rely upon) how any changes in the initial CRT price

then shipped by Plaintiffs to Plaintiffs' stores for ultimate purchase by the end-user consumer; and (vii) payments for CRTs and CRT Products were issued from Sears and Kmart's accounts maintained at financial institutions in the United States, including in Illinois, Michigan, and California. Because that request does not adequately define "location" as applied to financial institutions, and given that the "location" of a financial institution with a nationwide presence is subject to numerous potential responses, Plaintiffs are unable to provide more specific information. Plaintiffs further state that documents and transactional data produced in response to Defendants Tatung Company of America, Inc. and Samsung Electronics Co., Ltd's First Set of Requests for Production of Documents shall be deemed produced in response to this Interrogatory, subject to the Responses and Objections contained herein. The burden of identifying the specific information or documents responsive to this Interrogatory from review of the documents and data identified in this response is substantially the same for either Plaintiffs or the Defendants. *See Fed. R. Civ. P. 33(d)*. Additionally, the response to this Interrogatory may include the transactional data and other documents produced by Defendants, co-conspirators', and third party's discovery, and such other information as set forth in the initial report(s) of Plaintiffs' experts served on April 15, 2014.

Plaintiffs reserve the right to supplement their response to this Interrogatory based on further discovery, investigation, expert work, or other developments in this case.

Interrogatory No. 7:

Identify each entity other than Sears, Roebuck and Co. and Kmart Corporation, including by stating whether the entity is incorporated under the laws of a country other than the United States, that was involved in a purchase of a CRT or CRT Product upon which You base any claim in this action and describe the nature of that entity's involvement, including whether the entity:

- a. negotiated the price or other terms and conditions of purchasing the CRT or CRT Product;
- b. agreed to the purchase of the CRT or CRT Product;
- c. issued the purchase order for the CRT or CRT Product;
- d. received the invoice for the CRT or CRT Product;
- e. paid for the CRT or CRT Product; and
- f. used the CRT or CRT Product in the manufacturing or assembly of another product.

Response to Interrogatory No. 7:

Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs further object to this Interrogatory on the grounds that: (i) it is unreasonably overbroad, including without limitation General Instructions 8 and 9, thus making the response unduly burdensome; (ii) the terms "involvement" and "involved" are vague and ambiguous; (iii) it seeks information that is in Defendants' possession, custody, or control, and that has not yet been provided to Plaintiffs; and (iv) it seeks information that is the subject of ongoing discovery and investigation.

Subject to and without waiving their general and specific objections, Plaintiffs state that Kmart Corporation and Sears, Roebuck and Co. were involved in the purchase of CRT Products. Kmart Holding Corporation, a Delaware corporation incorporated in April 2003, became the parent company to the Kmart businesses after Kmart Corporation filed for bankruptcy protection in January 2002. Sears Holdings Corporation, a Delaware corporation incorporated in November 2004, became the parent company of Sears, Roebuck and Co. and Kmart Holding Corporation after Sears, Roebuck and Co. and Kmart Holding Corporation were involved in a business combination that led to the combined ownership of both entities in March 2005. Both Sears, Roebuck and Co. and Kmart Holding Corporation became wholly owned subsidiaries of Sears

Holdings Corporation, Kmart Corporation, Kmart Holding Corporation (individually and as successor to Kmart Management Corporation), Sears, Roebuck and Co., Sears Holdings Corporation, and Sears Holdings Management Corporation agreed to the purchase of CRTs and CRT Products, issued purchase orders for CRTs and CRT Products, received invoices for CRTs and CRT Products, and paid for CRTs and CRT Products. Sears Holdings Corporation and Sears Holdings Management Corporation have assigned their claims in this action to Sears, Roebuck and Co. Kmart Holding Corporation (individually or as successor to Kmart Management Corporation) has assigned its claims in this action to Kmart Corporation. Plaintiffs further state that documents and transactional data produced in response to Defendants Tatung Company of America, Inc. and Samsung Electronics Co., Ltd's First Set of Requests for Production of Documents shall be deemed produced in response to this Interrogatory, subject to the Responses and Objections contained herein. The burden of identifying the specific information or documents responsive to this Interrogatory from review of the documents and data identified in this response is substantially the same for either Plaintiffs or the Defendants. *See Fed. R. Civ. P. 33(d).* Additionally, the response to this Interrogatory may include the transactional data and other documents produced by Defendants, co-conspirators', and third party's discovery, and such other information as set forth in the initial report(s) of Plaintiffs' experts served on April 15, 2014.

Plaintiffs reserve the right to supplement their response to this Interrogatory based on further discovery, investigation, expert work, or other developments in this case.

Interrogatory No. 8:

For each entity Identified in Your response to Interrogatory No. 7, state whether Sears, Roebuck and Co. or Kmart Corporation had any ownership interest in, or exercised any control

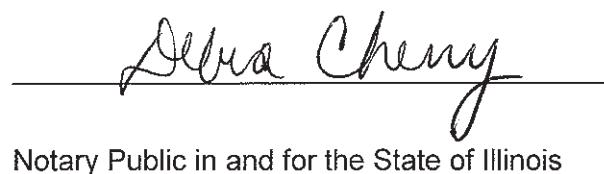
STATE OF ILLINOIS §
 §

COUNTY OF COOK §

Deann Bogner, being duly sworn, states that she is an Assistant Secretary and an authorized agent for the purpose of executing this document on behalf of Sears, Roebuck and Co. and Kmart Corporation that while she does not have personal knowledge of all of the facts recited in the foregoing document, the statements and information made herein have been collected and made available to her by counsel and employees of Sears, Roebuck and Co. and Kmart Corporation, that the information contained herein is true and correct to her knowledge and belief and the document is, therefore, verified on behalf of Sears, Roebuck and Co. and Kmart Corporation.


Deann Bogner

SUBSCRIBED AND SWORN to before by the said Deann Bogner on this 20th day of June, 2014, to certify which witness my hand and seal of office.


Debra Cherry
Notary Public in and for the State of Illinois

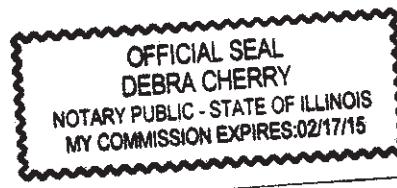


EXHIBIT 2

Page 1	Page 3
1 UNITED STATES DISTRICT COURT 2 NORTHERN DISTRICT OF CALIFORNIA 3 SAN FRANCISCO DIVISION 4 IN RE: CATHODE RAY TUBE (CRT)) 5 ANTITRUST LITIGATION) 6 -----) Case No. 07-5944 SC 7 This Document Relates to:) MDL NO. 1917 8 ALL ACTIONS) 9 -----) 10 HIGHLY CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER 11 12 The videotaped deposition of JAMES A. 13 SMITH, taken at The Chicago Marriott Northwest, 14 taken before Janice M. Kocek, CSR, CLR, Notary 15 Public and Certified Shorthand Reporter of said 16 State, taken at 4800 Hoffman Boulevard, Hoffman 17 Estates, Illinois, on the 11th day of July, 18 2014, at the hour of 9:00 o'clock a.m. 19 20 21 22 23 24 25	1 APPEARANCES: (Continued) 2 KIRKLAND & ELLIS LLP 3 BY: MR. KARL STAMPFL 4 300 North LaSalle 5 Chicago, Illinois 60654 6 312.862.2595 7 karl.stampfl@kirkland.com 8 Representing the Defendants Hitachi, 9 Ltd.; Hitachi America, Ltd.; 10 Hitachi Asia, Ltd.; Hitachi Displays, 11 Ltd.; and Hitachi Electronic Devices 12 USA; 13 BAKER BOTTS LLP 14 BY: MR. STEPHEN NG 15 (appeared via telephonically) 16 1299 Pennsylvania Ave., N.W. 17 Washington DC 20004-2400 18 202.639.7704 19 stephen.ng@bakerbotts 20 Representing the Defendants Koninklijke 21 Philips Electronics N.V., Philips 22 Electronics North America Corporation; 23 CURTIS, MALLETT-PREVOST, COLT & MOSLE LLP 24 BY: MS. ELLEN TOBIN 25 (appeared via telephonically) 1 101 Park Avenue 2 New York, New York 10178 3 212.696.8873 4 etobin@curtis.com 5 -and- 6 CURTIS MALLETT-PREVOST COLT & MOSLE LLP 7 BY: MR. JEFFREY I. ZUCKERMAN 8 (appeared via telephonically) 9 1717 Pennsylvania Avenue, N.W. 10 Washington, DC 20006 11 202.452.7350 12 jzuckerman@curtis.com 13 Representing Technologies Displays 14 Americas, LLC.; 15 16
Page 2	Page 4
1 APPEARANCES: 2 KENNY NACHWALTER, PA 3 BY: MR. WILLIAM J. BLECHMAN 4 201 South Biscayne Boulevard 5 Suite 1100 6 Miami, Florida 33131 7 305.373.1000 8 wblechman@knpa.com 9 Representing Direct Action 10 Plaintiffs Sears, Roebuck 11 and Company and the Deponent; 12 BRAMSON, PLUTZIK, MAHLER & BIRKHAEUSER, LLP 13 BY: MS. JENNIFER S. ROSENBERG 14 (appearing via telephonically) 15 2125 Oak Grove Road 16 Suite 120 17 Walnut Creek, California 94598 18 (925) 945-0200 19 jrosenberg@bramsonplutzik.com 20 Representing the Indirect Purchaser 21 Plaintiffs; 22 WHITE & CASE LLP 23 BY: MR. DANA E. FOSTER 24 701 Thirteenth Street, NW 25 Washington, DC 20005-3807 1 202.637.6181 2 defoster@whitecase.com 3 -and- 4 WHITE & CASE LLP 5 BY: MR. WILLIAM H. BAVE, III 6 1155 Avenue of the Americas 7 New York, New York 10036-2787 8 212.819.2673 9 wbave@whitecase.com 10 Representing the Defendants Toshiba 11 Corporation, Toshiba America, Inc., 12 Toshiba America Information Systems, 13 Inc., Toshiba America Consumer 14 Products, L.L.C., and Toshiba America 15 Electronic Components, Inc.;	1 APPEARANCES: (Continued) 2 FAEGRE BAKER DANIELS LLP 3 BY: Mr. STEPHEN M. JUDGE 4 (appeared via telephonically) 5 202 S. Michigan Street 6 Suite 1400 7 South Bend, Indiana 46601 8 574.239.1942 9 Steve.Judge@faegrebd.com 10 Representing the Defendants Thomson 11 Consumer Electronics, Inc. and 12 Thomson SA; 13 ALSO PRESENT: 14 Diana Hsu, Sears Holdings; 15 Weldon Anderson, videographer 16 17

1 A. A full-line store carries the full 2 line of Sears merchandise including apparel and 3 clothes. A dealer store would have been a 4 store that was -- it's kind of like a franchise 5 store. It would be where we have an 6 independent owner but Sears handles the -- the 7 inventory and the merchandising, and then the 8 person that was running the store would just 9 basically maintain the building and, you know, 10 sell the product to their customers -- 11 Q. Okay. 12 A. -- primarily in rural areas. 13 Q. Okay. For the full-line stores, 14 would all of them sell CRT televisions at this 15 time in March 1995? 16 A. Yes. 17 Q. Okay. And what about the dealer 18 stores? Would all of them sell CRT 19 televisions? 20 A. To the best of my recollection, at 21 that time, they did, yes. 22 Q. Okay. Again, staying at the -- at 23 the beginning of the relevant period in March 24 of 1995, can you tell me what percentage of the 25 full-line stores were located in California?	Page 69	Page 71 1 few less stores, but essentially it's similar 2 for full-line stores. 3 Q. Right. 4 A. We did have expansion in the dealer 5 stores. 6 Q. Okay. And tell me about that 7 expansion. 8 A. Again, I'd have to refer to 9 documents to be precise. But at -- at some 10 point in time, I believe there's as many dealer 11 stores as there are full-line stores; somewhere 12 around 800 to 1,000. 13 Q. Okay. In -- during the relevant 14 period, did Sears have an online presence? 15 A. Yes. 16 Q. Okay. Do you -- do you know when 17 they -- when that began? 18 A. I don't know precisely when it 19 began, no. 20 Q. Can you give me an estimate? 21 A. I'm going to estimate somewhere 22 around maybe 1996, '97, but it's just an 23 estimate on my part. 24 Q. Okay. Did Sears -- at -- at that 25 time, did Sears sell CRT televisions online?
1 A. No, I cannot. 2 Q. Arizona? 3 A. What percentage? 4 Q. Correct? 5 A. No. 6 Q. Okay. Can you tell me the 7 percentage of -- of these full-line stores that 8 were located in any particular state in which 9 Sears had stores? 10 A. I -- you know, perhaps our experts 11 would know what, what those are. I didn't -- 12 that's not something I would have tracked 13 precisely to be able to tell you what 14 percentage of the company was done in any 15 particular state. 16 Q. Okay. Okay. Did Sears have at this 17 time in early -- in March 1995, did Sears have 18 stores in every state? 19 A. To the best of my recollection, yes. 20 Q. Okay. So in March 1995, it had 21 approximately 875 full-line stores. Throughout 22 the period, did that number increase, decrease, 23 stay the same? 24 A. Pretty close to the same. I think 25 towards the end of the period we may have had a	Page 70	Page 72 1 A. Yes. 2 Q. Other than the full-line stores and 3 the dealer stores, did Sears have special -- 4 and the hardware stores, did Sears have 5 specialty name -- named stores that were named 6 something other than Sears? 7 A. Yes. 8 Q. Okay. And what, what were those? 9 A. Again, this will -- I'll give you 10 the ones I remember and I may not have all of 11 them. 12 Q. Okay. 13 A. We had a, a chain of stores called 14 The Great Indoors. 15 Q. Okay. 16 A. There was a period of time where 17 Sears had furniture stores called Homelife. 18 For a short time during that period, I think we 19 had a couple of -- I think they were called 20 Sears Appliance and Electronics Showroom. 21 There were a couple of those. Not a lot, but a 22 few. And those are the ones I can think of off 23 the top of my head. 24 Q. Okay. Were the buyers for the 25 televisions for the Sears stores different than

	Page 73	Page 75
<p>1 the buyers for the televisions at these 2 specialty stores?</p> <p>3 A. Basically, no. The, the buyers for 4 Sears pretty much procured all of the 5 merchandise. Slight exception to that, Great 6 Indoors, there were maybe some items that they 7 would have carried that were different, like a 8 -- maybe a very high-end television or 9 something like that.</p> <p>10 It still would have basically flown 11 through our organization -- same organization. 12 But there would have been somebody else, more 13 like a merchandising position, that would 14 coordinate a specialty item that may not have 15 applied to our full-line stores.</p> <p>16 Q. Okay. Is Sears -- in this -- in 17 this litigation, is Sears bringing claims based 18 on the sales of televisions from The Great 19 Indoors stores?</p> <p>20 A. I believe, yes.</p> <p>21 Q. Okay.</p> <p>22 A. You'd have to check with the 23 attorneys to know for sure, but my 24 understanding is it's all Sears. It's all the 25 same thing.</p>		<p>1 the 40-inch. Again, I won't be able to name 2 all of them. But it would be a very wide range 3 of sizes.</p> <p>4 Q. Can you -- sitting here today, can 5 you just tell me the sizes that you understand 6 Sears to have sold in March of 1995?</p> <p>7 A. Sure. I'll give you the common 8 sizes that I know would have been the very 9 prevalent ones: 13-inch; 14-inch; 19-inch was 10 a prevalent size; 25-inch; 26-inch; 27-inch; 11 30s; 30-inch, I should say; a 32-inch; 35; 36 12 to the best of my recollection; perhaps 40.</p> <p>13 And, again, I'd have to look at 14 another document to know if 40-inch CRTs were 15 in at that particular point in time.</p> <p>16 Q. Okay. So those are the sizes that 17 were -- let me just -- prevalent in 1995?</p> <p>18 A. Those are the common sizes that I 19 remember, yes.</p> <p>20 Q. Common sizes. And when you say the 21 common sizes you remember, you were, you were 22 -- you're saying that those are the sizes that 23 Sears sold?</p> <p>24 A. Those were the sizes that existed in 25 the industry, and we sold pretty much</p>
<p>1 Q. Okay. The buyers for televisions 2 that were within the home electronics, I guess, 3 group at Sears, were they located in Hoffman -- 4 in Hoffman Estates?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And that's for the whole 7 entire relevant period?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. In 1995, and let's start at 10 the beginning of the relevant period, what CRT 11 televisions did Sears sell?</p> <p>12 A. I'm not sure if I understand your 13 question.</p> <p>14 Q. Sure. Well, let's start -- let 15 me -- let me try to ask a different question.</p> <p>16 What sizes of CRT televisions did 17 Sears sell at the beginning of the relevant 18 period, March of 1995?</p> <p>19 A. Again, I'll go by to the best of my 20 recollection.</p> <p>21 Q. Yeah.</p> <p>22 A. It could be a small size from a, you 23 know, 4-inch tube, you know, all the way on up 24 to -- you know, the biggest tubes that existed 25 at the time probably were in the large 30- to</p>	Page 74	<p>1 everything that was available the industry.</p> <p>2 Q. Okay. And -- okay. But you're -- 3 am I correct that you're not -- you don't 4 recall -- you're, you're not testifying that 5 Sears sold these. You're saying that you -- 6 that Sears sold pretty much what the industry 7 sold, which were these sizes. Is that your -- 8 is that -- am I accurate with that? Let me -- 9 let me try again. Let me try again.</p> <p>10 Because one of the reasons I'm 11 asking this question is because there's -- and, 12 and you've, you've noted it. You've noted a 13 couple times in your answers about documents 14 and, and, and -- and charts. But there's -- 15 because it's such a long time ago, there's not 16 very much or any. So that's why I'm, I'm 17 needing to ask you questions about what Sears 18 sold back in 1995.</p> <p>19 So sitting here today, testifying on 20 behalf of Sears, can you tell me precisely what 21 size televisions Sears sold in 1995, March 22 1995?</p> <p>23 MR. BLECHMAN: Hold it. Object to 24 form. This question has been asked and 25 answered by Mr. Smith already.</p>

	Page 81	Page 83
1 Okay. 2 And from 1995 to 2007, were the 3 buyers for CRT televisions contained within 4 that business unit? 5 A. Yes. 6 Q. Okay. During the relevant period, 7 from whom did Sears purchase CRT -- CRT 8 televisions? 9 A. Okay. It's a pretty long list. 10 I'll give you the ones that I can remember. 11 Q. Okay. 12 A. Hitachi, Toshiba, Samsung, LG, 13 Thomson. I'm sure there's others. If you give 14 me some time, I could probably come up with 15 some more. It's a long list. 16 Q. Okay. Okay. Can you -- so you 17 mentioned Hitachi. Can you tell me the 18 specific entity from whom Sears purchased CRT 19 televisions? 20 A. I can go by recollection some of 21 them that I remember. 22 Q. Okay. 23 A. Hitachi Home Electronics America, if 24 I'm -- and forgive me. I may not have the 25 corporate name exactly correct.	1 A. I can't recall any off the top of my 2 head. 3 Q. Yes, you did mention LG. Can you 4 tell me the specific entity from whom Sears 5 purchased CRT televisions? 6 A. Yeah, the -- the ones that I can 7 recall would be LG -- we refer to it as LGE, 8 LGE Electronics U.S., I believe. At one point 9 in time Zenith would have been the company. 10 And those are the two that I can remember off 11 the top of my head. 12 Q. All right. And then you mentioned 13 Thomson. Can you tell me the specific Thomson 14 entity from whom Sears purchased CRT 15 televisions? 16 A. I believe it was called Thomson 17 Consumer Electronics. And, again, you'll have 18 to forgive me. I may not know the corporate 19 name. It was RCA-branded television, 20 primarily. 21 Q. Okay. Did Sears purchase CRT 22 televisions from distributors? 23 A. Generally, no, I'm not aware of it. 24 Q. Generally, no? 25 A. The, the exception may have been a	
	Page 82	Page 84
1 Q. Okay. 2 A. But Hitachi America. Hitachi High 3 Technologies. 4 Q. Okay. 5 A. And those would be the, the two that 6 I can recall specifically during that period of 7 time. 8 Q. Okay. And you mentioned Toshiba. 9 Can you tell me the specific Toshiba entity 10 from whom Sears purchased CRT televisions? 11 A. Again, I believe by my 12 recollection -- I'd have to look at documents 13 to know the specific name. 14 Q. Okay. 15 A. Toshiba America. I can recall 16 Toshiba America Consumer Products. And, again, 17 some of these names have changed slightly over 18 time, but I -- I view it as Toshiba. 19 Q. Okay. And then you mentioned 20 Samsung. Can you tell me the specific entities 21 from whom -- 22 A. Samsung Electronics America. 23 Q. Okay. Any others? 24 A. Did we -- did I mention LG? 25 Q. Yeah, yeah. Any other Samsung?	1 small quantity for sears.com, you know, some 2 item that we didn't carry in the stores, but 3 no, no, nothing of significance that I can 4 recall. 5 I actually can't even say it ever 6 happened with CRTs. I know in the later 7 dot-com world it was probably more prevalent 8 for other kinds of products where we would use 9 a distributor, but I don't recall CRT TVs at 10 all. 11 Q. Okay. What about wholesalers? 12 A. No, not that I can recall. 13 Q. Okay. What about -- so let's talk 14 about computer monitors. From which -- from 15 whom did Sears purchase CRT monitors? 16 A. Okay. I'll, I'll go to the best of 17 my recollection again. 18 Q. Absolutely. 19 A. Packard Bell, IBM, Apple, Hewlett 20 Packard, Compaq. Those are the ones that I'll 21 be able to name off the top of my head. 22 Q. Okay. Did Sears purchase CRT 23 monitors from distributors? 24 A. Not to my knowledge. 25 Q. Okay. Are you, are you familiar	

EXHIBIT 3A

(Snapshot of SEAR-CRT00000004-3B-Highly Confidential.xls)

DIV_NO	LN_NO	SBL_NO	CLS_NO	ITM_NO	PRD_IRL_NO	VND_HFC_NO	QTR_NO	PER_NO	loc_no	location_type	LOC_STE	RCP_TYP_CD	Sum(UN_QT)	Sum(CST_DLR)	Sum(SLL_DLR)
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	NJ	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	OK	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	WA	S	4	815.96	959.96
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	OH	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	TN	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	TX	C	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	FL	S	4	815.96	959.96
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	LA	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	VA	S	5	1019.95	1199.95
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	CT	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	MS	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	SD	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	PA	S	4	815.96	959.96
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	NC	C	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	IL	S	6	1223.94	1439.94
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	NM	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	WI	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	MA	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	AL	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	NY	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	MD	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	MS	C	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	AZ	S	3	611.97	719.97
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	MD	C	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	IL	C	5	1019.95	1199.95
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	LA	C	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	SC	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	CA	S	6	1223.94	1439.94
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	NC	S	5	1019.95	1199.95
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	TX	S	8	1631.92	1919.92
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	AR	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	RI	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	IA	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20701	0	ST	KS	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20701	1738	ST	HI	V	1	208.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	IL	C	5	998.95	1199.95
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	MN	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	AL	S	3	611.97	719.97
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	TX	S	3	611.97	719.97
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	NJ	S	3	611.97	719.97
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	GA	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	AL	C	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	TN	S	3	611.97	719.97
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	IN	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	MA	S	3	611.97	719.97
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	AR	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	MD	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20702	0	DC	IL	S	27	5507.73	6479.73
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	NC	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	DE	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	CA	S	6	1223.94	1439.94
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	NC	C	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	LA	S	4	815.96	959.96
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	IA	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	VT	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	MI	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	FL	S	3	611.97	719.97
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	NY	S	4	815.96	959.96
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	KY	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	NM	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	MS	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	OK	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	TN	C	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	WV	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	GA	C	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	IL	S	5	1019.95	1199.95
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	WA	S	4	815.96	959.96
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	CT	S	1	203.99	239.99
3	18	10	40	56007	10947939	174054577	20071	20702	0	ST	AZ	S	2	407.98	479.98
3	18	10	40	56007	10947939	174054577	20071	20702	1578	ST	HI	V	3	626.97	719.97
3	18	10	40	56007	10947939	174054577	20071	20703	0	ST	CA	S	25	5099.75	5999.75
3	18	10	40	56007	10947939	174054577	20071	20703	0	ST	IL	S	9	1835.91	2159.91
3	18	10	40	56007	10947939	174054577	20071	20703	0	ST	NV	S	1	203.99	239.99

EXHIBIT 3B

(Snapshot of SEAR-CRT00000007-HIER-Highly Confidential.xls)

DIV_NO	57	
LN_NO	(Multiple Items)	5,6,7
Row Labels		
0		
UNIDENTIFIED VENDOR		
50500		
ORION ELECTRIC CO LTD		
62257		
LOEWE OPTA INC		
70490		
HAIER AMERICA TRADING LLC		
116699		
KMART DDC (K2S)		
122390		
SENSIO INC		
278366		
HANNSPREE CALIFORNIA INC		
1794106		
HITACHI HIGH TECHNOLOGIES		
1818012		
SHARP ELECTRONICS CORP		
5120704		
ZENITH ELECTRONICS CORPOR		
6932305		
THOMSON CONSUMER ELECTRON		
7911209		
D & H DISTRIBUTING CO		
37916236		
PHILIPS CONSUMER ELECTRON		
42840231		
PRODUCTS FULFILLMENT INC		
44694040		
AUDIOVOX CORPORATION		
44701126		
US JVC CORP		
44725740		
APEX DIGITAL		
47394291		
TOSHIBA HAWAII INC		
53202578		
PANASONIC NATIONAL SALES		
57864217		
FUNAI U S A CORP		
59204966		
DPI INC		
64993082		
TOSHIBA AMERICA INC		
66272964		
SONY HAWAII COMPANY		
70094818		
LG ELECTRONICS USA INC		
77010254		
SAMSUNG ELECTRONICS AMERI		
83819425		
DAEWOO ELECTRONICS AMERIC		
90117367		
QUINTANA QUINTANA CORP		
116658043		
PRIMA TECHNOLOGY INC		
118786961		
UMBRA LLC		
131146698		

DIV_NO	3	
LN_NO	42	
Row Labels		
0		
UNIDENTIFIED VENDOR		
63941		
HARTFORD COMPUTERS/SURPLU		
151514		
3I CORPORATION LTD		
199448		
INTERNATIONAL FURNITURE D		
407049		
CTX INTERNATIONAL INC		
1368083		
INTERNATIONAL BUSINESS MA		
1794106		
HITACHI HIGH TECHNOLOGIES		
3897733		
COMPAQ COMPUTER CORPORATI		
4469193		
RUBBERMAID INC		
7911209		
D & H DISTRIBUTING CO		
7976384		
S P RICHARDS CO		
8868937		
SANYO FISHER USA CORPORAT		
9122532		
HEWLETT-PACKARD COMPANY		
18978783		
UNITED STATIONERS SUPPLY		
35985522		
NEW HORIZONS MARKETING		
37916236		
PHILIPS CONSUMER ELECTRON		
42969543		
ARCHBROOK LAGUNA LLC		
44096886		
EMACHINES		
46000076		
PACIFIC DESIGN L P		
60704780		
APPLE COMPUTER INC		
66272964		
SONY HAWAII COMPANY		
76134076		
ZT GROUP INTL INC		
77010254		
SAMSUNG ELECTRONICS AMERI		
81729667		
LENMAR ENTERPRISES INC		
87781381		
AAAA WORLD INC		
137522384		
SITOA CORPORATION		
148265713		
PETRA INDUSTRIES		
155391121		
PACKARD BELL ELECTRONICS		
186542296		
NEW AGE ELECTRONICS INC		

SENSORY SCIENCE CORPORATI	602138570
143630098	SONY ELECTRONICS
WESTINGHOUSE DIGITAL ELEC	604102574
147761162	DBL DISTRIBUTING LLC
TTE TECHNOLOGY INC	606855831
174054577	PROTEVA COMPUTERS
SONY PUERTO RICO INC	611502779
194506200	MIRUS INNOVATIONS LLC
HITACHI SALES CORP OF AME	791101728
602138570	CTC CORPORATION
SONY ELECTRONICS	796648988
604102574	PROVIEW TECHNOLOGY INC
DBL DISTRIBUTING LLC	877929992
626592273	SONY COMPUTER ENTERTAINME
POWER MERCHANDISING CORP	878594803
797026796	PIXIE TECHNOLOGIES INC
F A SYSTEMS INC	884461773
805150919	NORTHGATE INNOVATIONS INC
ORION AMERICA INC	884597469
877573725	PRICELESS RESOURCE INC
IMPERIAL SALES	Grand Total
927545582	
MEMCORP INC	
Grand Total	

SEAR_CRT00000007-HIER-Highly Confidential.xls

EXHIBIT 3C

(Snapshot of KMRT-CRT00000012-2007-Highly Confidential.xls)

Pay Duns	Ord Duns	Name	DC	Rcv State	KSN	Vend Stocl	BaseSku	Desc	Retail	Gtin	Orig	Adj	Rcvd	Unit Cost
147761162	337121	TTE TECHNOLOG	8287	CA	91566011	20V504T	91566011	RCA 20 SDTV	20V5	846042060240	100	100	100	129.5
147761162	337121	TTE TECHNOLOG	8275	PA	91566011	20V504T	91566011	RCA 20 SDTV	20V5	846042060240	170	170	170	129.5
147761162	337121	TTE TECHNOLOG	8273	KS	72423711	20F542T	72423711	RCA 20 FLAT SDTV	20	846042060301	95	50	50	139
147761162	337121	TTE TECHNOLOG	8299	MN	72423711	20F542T	72423711	RCA 20 FLAT SDTV	20	846042060301	87	87	87	139
147761162	337121	TTE TECHNOLOG	8272	NV	72423711	20F542T	72423711	RCA 20 FLAT SDTV	20	846042060301	90	90	90	139
147761162	337121	TTE TECHNOLOG	8287	CA	72423711	20F542T	72423711	RCA 20 FLAT SDTV	20	846042060301	120	100	100	139
147761162	337121	TTE TECHNOLOG	8288	NC	72423711	20F542T	72423711	RCA 20 FLAT SDTV	20	846042060301	130	130	130	139
147761162	337121	TTE TECHNOLOG	8289	IL	72423711	20F542T	72423711	RCA 20 FLAT SDTV	20	846042060301	135	135	135	139
147761162	337121	TTE TECHNOLOG	8275	PA	72423711	20F542T	72423711	RCA 20 FLAT SDTV	20	846042060301	140	140	140	139
147761162	337121	TTE TECHNOLOG	8298	GA	72423711	20F542T	72423711	RCA 20 FLAT SDTV	20	846042060301	150	150	152	139
147761162	337121	TTE TECHNOLOG	8305	OH	72423711	20F542T	72423711	RCA 20 FLAT SDTV	20	846042060301	190	190	190	139
147761162	337121	TTE TECHNOLOG	8292	FL	72423711	20F542T	72423711	RCA 20 FLAT SDTV	20	846042060301	270	270	270	139
147761162	337121	TTE TECHNOLOG	8292	FL	72423711	20F542T	72423711	RCA 20 FLAT SDTV	20	846042060301	35	35	35	139
147761162	337121	TTE TECHNOLOG	8292	FL	72423711	20F542T	72423711	RCA 20 FLAT SDTV	20	846042060301	405	405	405	139
147761162	337121	TTE TECHNOLOG	8292	FL	72423711	20F542T	72423711	RCA 20 FLAT SDTV	20	846042060301	550	550	550	139
147761162	337121	TTE TECHNOLOG	8292	FL	91566011	20V504T	91566011	RCA 20 SDTV	20V5	846042060240	669	669	669	129.5
147761162	337121	TTE TECHNOLOG	8292	FL	91566011	20V504T	91566011	RCA 20 SDTV	20V5	846042060240	731	731	731	129.5
147761162	337121	TTE TECHNOLOG	8273	KS	91566011	20V504T	91566011	RCA 20 SDTV	20V5	846042060240	30	30	30	129.5
147761162	337121	TTE TECHNOLOG	8298	GA	91566011	20V504T	91566011	RCA 20 SDTV	20V5	846042060240	150	148	148	129.5
147761162	337121	TTE TECHNOLOG	8289	IL	91566011	20V504T	91566011	RCA 20 SDTV	20V5	846042060240	200	200	200	129.5
147761162	337121	TTE TECHNOLOG	8272	NV	91566011	20V504T	91566011	RCA 20 SDTV	20V5	846042060240	220	220	220	129.5
147761162	337121	TTE TECHNOLOG	8288	NC	91566011	20V504T	91566011	RCA 20 SDTV	20V5	846042060240	300	300	300	129.5
147761162	337121	TTE TECHNOLOG	8287	CA	91566011	20V504T	91566011	RCA 20 SDTV	20V5	846042060240	300	300	300	129.5
147761162	337121	TTE TECHNOLOG	8292	FL	91566011	20V504T	91566011	RCA 20 SDTV	20V5	846042060240	325	325	325	129.5
147761162	337121	TTE TECHNOLOG	8305	OH	91566011	20V504T	91566011	RCA 20 SDTV	20V5	846042060240	475	475	475	129.5
147761162	337121	TTE TECHNOLOG	8275	PA	91566011	20V504T	91566011	RCA 20 SDTV	20V5	846042060240	600	600	600	129.5
147761162	337121	TTE TECHNOLOG	8298	GA	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	84	84	84	127
147761162	337121	TTE TECHNOLOG	8299	MN	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	92	92	92	127
147761162	337121	TTE TECHNOLOG	8305	OH	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	134	134	134	127
147761162	337121	TTE TECHNOLOG	8289	IL	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	142	142	142	127
147761162	337121	TTE TECHNOLOG	8275	PA	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	142	142	142	127
147761162	337121	TTE TECHNOLOG	8272	NV	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	142	142	144	127
147761162	337121	TTE TECHNOLOG	8292	FL	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	142	142	179	127
147761162	337121	TTE TECHNOLOG	8288	NC	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	192	192	192	127
147761162	337121	TTE TECHNOLOG	8273	KS	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	242	242	242	127
147761162	337121	TTE TECHNOLOG	8287	CA	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	242	242	242	127
147761162	337121	TTE TECHNOLOG	8290	CO	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	350	299	299	127
147761162	337121	TTE TECHNOLOG	8298	GA	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	358	310	310	127
147761162	337121	TTE TECHNOLOG	8298	GA	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	358	356	356	127
147761162	337121	TTE TECHNOLOG	8305	OH	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	358	358	358	127
147761162	337121	TTE TECHNOLOG	8305	OH	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	358	358	358	127
147761162	337121	TTE TECHNOLOG	8273	KS	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	358	358	358	127
147761162	337121	TTE TECHNOLOG	8273	KS	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	358	358	358	127
147761162	337121	TTE TECHNOLOG	8289	IL	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	358	358	358	127
147761162	337121	TTE TECHNOLOG	8275	PA	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	358	358	358	127
147761162	337121	TTE TECHNOLOG	8287	CA	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	358	358	358	127
147761162	337121	TTE TECHNOLOG	8292	FL	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	358	358	358	127
147761162	337121	TTE TECHNOLOG	8288	NC	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	358	358	358	127
147761162	337121	TTE TECHNOLOG	8299	MN	1958011	24V511T	1958011	RCA 24" STEREO TV	2'	34909415139	358	358	358	127